

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IGNACIO LANUZA,

Plaintiff,

v.

UNITED STATES OF AMERICA ET AL.

Defendants.

Case No. 2:14-cv-01641-BJR

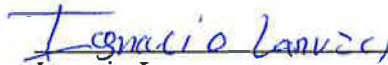
**DECLARATION OF IGNACIO
LANUZA IN SUPPORT OF
RESPONSE TO DEFENDANTS'
MOTION FOR FEES AND
SANCTIONS**

I, Ignacio Lanuza, declare as follows:

1. I am the Plaintiff in this action. The matters contained in this Declaration are of my personal knowledge and, if called as a witness, I could and would testify competently to the matters set forth herein.
2. I work in construction, and as a result, my income varies from month to month. During the summer I can earn up to \$4,000 a month, but during the winter months, it can be far less, like \$2,500.

- 1 3. I have a 2005 Chrysler 300. I bought it for \$16,000 many years ago, and I still own the
2 car today. I also have an old Nissan 1996 pickup truck. These are the main assets that I
3 have.
- 4 4. I do not have more than \$1,000 in my bank account.
- 5 5. My rent and utilities cost around \$1,700 a month. In addition, I have to pay \$400 a month
6 for food and likely around \$200 a month for gas.
- 7 6. I also pay several hundred dollars a month for expenses related to my children.
- 8 7. I estimate that I spent at least \$15,000 to defend my immigration case. I paid my first
9 lawyer over \$5000, and after he died, I received \$1200 back. I then hired Carol Edwards
10 as my lawyer, and my records indicate that I paid her nearly \$7,000. After Carol, my wife
11 and I hired Hilary. Hilary charged me \$6,000 for his services. I am continuing to make
12 payments to Hilary, and have an outstanding debt to Hilary of \$2,500. I also had to pay
13 the costs for filings during my immigration case, and for services like the forensic report.
- 14 8. During my immigration case, my family was not able to save any money. We had to pay
15 for the kids and the immigration case. My wife took care of the kids, while I worked to
16 pay for everything.
- 17
18
19
20
21
22
23
24

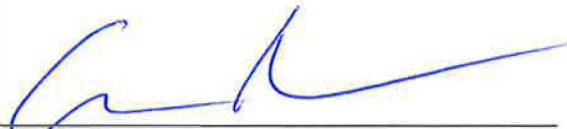
1 EXECUTED this 5th day of September, 2019 in Seattle, Washington.

2 
3 Ignacio Lanuza

1 **CERTIFICATE OF INTERPRETATION**

2 I, Aaron Korthuis, hereby certify that I interpreted the attached declaration into Spanish
3 and read it to the declarant who indicated that he understood it and agreed to its contents. I further
4 certify that I am competent in both English and Spanish to render and certify such interpretation.

5 Dated this 5th day of September, 2019.

6 
7 _____
8 Aaron Korthuis
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on September 10, 2019, I electronically filed the foregoing with the
3 Clerk of the Court using the CM/ECF system which will send notification of such filing to the
4 following:

5 Timothy M. Durkin: USAWAE.TDurkinECF@usdoj.gov
6 CaseView.ECF@usdoj.gov
7 Tim.Durkin@usdoj.gov
kendall.curtis@usdoj.gov
mary.f.buhl@usdoj.gov

8 And I hereby certify that I have mailed by United States Postal Service the document to the
9 following non CM/ECF participants:

10 None.

11
12 Dated: September 10, 2019

s/ Aaron Korthuis
615 Second Ave. Suite 400
Seattle, WA 98104
Tel: (206) 816-3872
aaron@nwirp.org